

Mieles, Janette

From: McChesney, Dennis
Sent: Friday, January 09, 2015 3:24 PM
To: Taylor, Karen
Subject: RE: PRUST approval

Will do. Unlikely that anything will happen for a few years after EPA's revised regulations are promulgated. See for eg response to OIG on a new MOA with the USVI circulated yesterday.

OIG Recommendation No. 13

To address problems with the implementation of the UST/LUST programs, we recommend that the Regional Administrator, EPA Region 2 establish an updated UST/LUST Memorandum of Agreement with the USVI that reflects changes and new provisions resulting from the EAct 2005. The Memorandum of Agreement should also outline roles, responsibilities and expectations.

Region 2 Corrective Action and Time

Region 2 agrees with the recommendation. In its December 14, 2011 response to OIG's Draft Report: Controls Over State Underground Storage Tank Inspection Programs in Three EPA Regions are Generally Effective, Project No. 2011-0019, EPA's Office of Solid Waste and Emergency Response (OSWER) responded to a similar finding as follows: "We generally agree with the recommendation to have EPA and states enter into MOAs reflective of changes from EAct and addressing oversight of municipalities conducting inspections. We are currently in the process of updating the UST regulations and recognize that certain proposed changes to the existing regulations may cause states to amend different aspects of their programs. As a result, we will ensure this recommendation is implemented concurrently to the process outlined in the proposed regulations for states to reapply for SPA." EPA's Office of Underground Storage Tanks informs us that the expectation is that new MOAs will be in place within three years of the revised UST regulations' promulgation. The revised regulations are currently under review by OMB and are expected to be promulgated in 2015. Assuming that the UST regulations are promulgated this fiscal year, the estimated completion of the updated MOA is 4th Quarter FY 2018.

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-----Original Message-----

From: Taylor, Karen
Sent: Friday, January 09, 2015 3:10 PM
To: McChesney, Dennis
Subject: PRUST approval

Dennis,

Would appreciate it if you keep me in the loop on the next steps for the PRUST program approval.

Thanks,

Karen